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Attorneys for Plaintiffs, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC
PIONEER INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and
UCA GENERAL INSURANCE SERVICES

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CENTURY-NATIONAL INSURANCE
COMPANY, a California corporation,
PACIFIC PIONEER INSURANCE GROUP,
INC., a Delaware corporation, PACIFIC
PIONEER INSURANCE COMPANY, a
California corporation, and UCA GENERAL
INSURANCE SERVICES, a California
corporation,

Plaintiffs,

vs.

DOUGLAS J. GARDNER, ESQ., an
individual, DOUGLAS J. GARDNER, LTD.,
a Nevada domestic professional corporation,
RANDS & SOUTH, LTD., a Nevada domestic
professional corporation, ALPS PROPERTY
& CASUALTY INSURANCE COMPANY, a
Montana corporation, DOES 1 through 20,
inclusive

Defendants.

Case No.: 2:18-cv-02090-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
~~PROPOSED~~ LITIGATION PLAN
(First Request)**

1 The Parties through their respective counsel of record hereby stipulate and agree as
2 follows:

3 This action arises from a dispute over Plaintiffs' claims of legal malpractice, breach of
4 contract, and fraud in the defense to judgment and post-judgment settlement of a multi-million
5 dollar underlying action for personal injury damages.

6 On January 4, 2023, counsel for Plaintiffs and Defendants appeared before the Court to
7 be heard on Defendants' motions for reconsideration and to exclude evidence. During the
8 hearing the Court ordered the Parties to meet and confer on a plan for further discovery,
9 mediation, motions and trial, and to submit a proposed or stipulated litigation plan to Magistrate
10 Judge Cam Ferenbach within 30 days.

11 Thereafter, the Parties agreed to meet and confer after having an opportunity to review
12 the January 4, 2023 hearing transcript. However, the hearing transcript was not prepared and
13 made to the Parties until on or about January 24, 2023.

14 The Parties met and conferred on January 31, 2023 and determined that they needed more
15 time to discuss and determine their positions on the scope and timing of a proposed litigation
16 plan and schedule for related motion practice, mediation and trial.

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Wherefore, the Parties hereby stipulate and request that the deadline to file a proposed or stipulated litigation plan be extended two weeks from the current deadline of Friday, February 3, 2023, to Friday, February 17, 2023, to facilitate the Parties' efforts in meeting and conferring on and preparing a stipulated or proposed litigation plan.

This is the Parties' first request for extension on this matter.

IT IS SO STIPULATED.

Dated February 1, 2023

PYATT SILVESTRI

MARSHALL & ASSOCIATES

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Attorney for Defendant ALPS

ORDER

IT IS SO ORDERED.

DATED this 2nd day of February 2023


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of February 2023, I served the above **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE PROPOSED LITIGATION PLAN** through CM/ECF system of the United States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

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/s/ Kim K. Ranck
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